

EXHIBIT 7



WSOU v. Google - Links for Depositions Scheduled on 10/8/2021

Travis Richins <travis@etheridgelaw.com>

Tue, Oct 5, 2021 at 7:03 PM

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Greg,

We explained at the September 24 conference that depositions should not go forward under Google's extreme limitations, which interfere with WSOU's ability to conduct the discovery to which it is entitled. We have repeatedly asked for a meet and confer on matters for examination because Google has improperly limited the items on which it will prepare its witnesses. We attempted to confer on the matters for examination on September 24, but Google refused. Instead, Google pushed forward by sending its defective designations and available dates, ignoring the requirement to confer on matters for examination and claiming Google first needed WSOU's objections to Google's 30(b)(6) notice before Google would confer. After WSOU sent its objections, rather than reach out to confer, Google rushed ahead with a "Dispute Chart" that ignores the Rule 30(b)(6) conference requirement and insists that WSOU provide dates without explanation for multiple days of WSOU C-level executives.

Not only that, but Google's "Dispute Chart" falsely states that WSOU has refused to designate witnesses. As you know from the September 24 conference, given Google's unwillingness to confer on the matters for examination at the conference, the parties agreed to hold the conference after WSOU served its objections.

Your pattern of conduct does not demonstrate a sincere effort to coordinate depositions. It is instead a transparent attempt to rush through the process and deny WSOU meaningful testimony from Google's witnesses by improperly limiting their testimony and by withholding documents.

As an example, your designation of Vivek Patwardhan (who you claim is available this Friday) offers him on Topic No. 28, requesting "Sales of the Accused Instrumentalities and attendant sales data," but you have limited his testimony to "only provide information with respect to the accused functionality" that Google unilaterally and impermissibly limited. You have likewise limited your designation for other topics on which Vivek Patwardhan is designated.

The deficiencies caused by your Rule 30(b)(6) objections and designations are compounded by your production deficiencies and your outright refusal to allow access to the source code for months.

Your suggestion that WSOU must accept the date offered or waive the right to depose Google is unfounded and deserves little response. We expect Google to cooperate in resolving issues concerning the matters for examination and to tender witnesses who are adequately prepared on the full scope of the allowable discovery.

We are available to confer on Thursday from 9am-11am CT. Please confirm your willingness and availability.

Sincerely,

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Subject: RE: WSOU v. Google - Links for Depositions Scheduled on 10/8/2021

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